

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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IN RE: PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESale PRICE  
LITIGATION

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) MDL NO. 1456  
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) CIVIL ACTION: 01-CV-12257-PBS  
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THIS DOCUMENT RELATES TO:  
ALL CLASS ACTIONS

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) Judge Patti B. Saris  
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**DEFENDANT GLAXOSMITHKLINE'S ASSENTED TO MOTION TO  
ENLARGE TIME TO RESPOND TO PLAINTIFFS' MOTIONS TO COMPEL**

Defendant SmithKline Beecham Corporation d/b/a GlaxoSmithKline ("GSK") hereby moves, with plaintiffs' assent, to enlarge until April 1, 2005 the time to respond to the following motions filed by plaintiffs:

1. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Rule 30(b)(6) Witnesses, filed February 3, 2005.
2. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Documents in the Manner Required by Rule 34(b), filed February 3, 2005.

With plaintiffs' assent, GSK moves to enlarge the time for response to both motions until April 1, 2005. The reason for this request is that GSK has identified a former GSK employee who may be qualified to serve as a 30(b)(6) witness for GSK under the notice at issue in the pending motion. GSK plans to interview the former employee on March 17, 2005 and, as soon as reasonably possible thereafter, either designate the former employee as a 30(b)(6) witness and provide a deposition date or provide another designee. GSK has also provided information, and expects to provide additional information, requested by plaintiffs that GSK expects will resolve the Rule 34(b) motion to compel. GSK believes that the issues raised by these motions can be resolved prior to the expiration of this enlargement.

WHEREFORE, for the foregoing reasons, GSK respectfully requests that this motion be granted.

Respectfully submitted,

Assented to,

By /s/ Geoffrey E. Hobart

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Dated: March 15, 2005

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**CERTIFICATE OF SERVICE**

Docket No. MDL 1456

I, Geoffrey E. Hobart, hereby certify that I am one of GSK' attorneys and that, on March 15, 2005, I caused copies of Defendant GlaxoSmithKline's Assented-To Motion to Enlarge Time to Respond to Plaintiffs' Motions to Compel to be served via VeriLaw on all counsel of record.

**/s/ Geoffrey E. Hobart**

Dated: March 15, 2005

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